

Whistleblowing Policy

Introduction

Havila is committed to the highest standards of openness, ethical behaviour and accountability.

An important aspect of accountability and transparency is a mechanism to allow employees to voice concerns in a responsible and effective manner. Employees should not fear either reprisal or dismissal for reporting instances internally that they believe show serious malpractice, illegal activity, or wrongdoing.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice, illegal activity or impropriety. It is not designed to question financial, or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

The "whistleblowing" is expected to be used by employees to have a matter investigated and dealt with inside the company rather than to air their concerns outside the company to third parties. It is understood that anonymity may be required by the "whistle blower" and this of course would be respected.

Whistleblowing can be done at the following address:

<https://havalaservice.integrity.complylog.com/>

Scope of Policy

This policy is designed to enable employees of Havila Shipping ASA to raise concerns internally at a high management level and to disclose information which the individual believes shows malpractice, illegal activity or impropriety. This policy is intended to cover concerns which go against the company's interests. In the first instance these may be investigated internally but may then lead to external authorities being brought in, depending on the severity of the activity found.

Scope of concerns could include:

- Financial malpractice or impropriety or fraud.
- Failure to comply with a legal obligation or statutes.
- Hazards to health & safety or the environment.
- Criminal activity.
- Improper conduct or unethical behaviour.
- Attempts to conceal any of these.

Protection and communication

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- in good faith.
- in the reasonable belief of the individual making the disclosure that it shows malpractice, illegal activity or impropriety.

- the disclosure is made to an appropriate person within the company either the DPA or the CEO.

Governance

This Whistleblowing Policy has been approved by the Board of Directors. The CEO of each company in Havila is the owner of the policy and is ultimately responsible for the implementation and monitoring of its operational effectiveness.